AREAS OF CONCERN:

AOC Number: A

AOC Name: Thinner Tank/Xylene Spill

Location: The Thinner Tanks are located west of the Manuafacturing Building.

Description: Leakage of paint thinner from an underground pipeline was discovered in early 1985 (Ref. 47). The underground pipeline carried paint thinner from three underground tanks containing product paint thinner. The release of paint thinner solvents, consisting primarily of xylene, toluene, and ethyl benzene, most likely occurred over a period of time. Following detection of paint solvent leakage in the vicinity of the bulk storage tanks, monitoring wells were installed in April 1985. Sample testing revealed free product floating on the water table in several wells. In May 1985, an 18-inch purge well was installed adjacent to the underground tanks and pumping of groundwater was initiated, forming a cone of depression to capture floating product. By April 1986, 320 gallons of product had been recovered.

On February 18, 1986, a NYDEC Consent Order was issued, instructing GMC to submit water quality monitoring reports from nine monitoring wells in the vicinity of the underground thinner tanks (Ref. 75). Until monitoring reports indicate that the water samples contain less than 100 parts per billion (ppb) of toluene, xylene, and ethylbenzene combined and less than 50 ppb of each constituent for a period covering six consecutive sampling reports, cyclic pumping of the groundwater must be conducted. When the above-cited criteria are met for a period covering three consecutive sampling periods, pumping must continue on an as-needed basis with monitoring reports submitted quarterly. After four consecutive quarterly and monitoring reports meet the above criteria, monitoring must be conducted once per year for a period of five years. The order also instructed GMC to disconnect and cap all underground thinner lines and to initiate a program for identifying the extent of soil contamination caused by the solvent leak.

Results of further investigation into the extent of contamination conducted in 1986 showed the highest levels of contamination adjacent to the former storage tank and in wells located in or next to backfilled trenches of underground piping. No wells or borings were drilled inside the building; however, it can be inferred that contaminated groundwater has migrated under the building. Soil analysis results show contamination in roughly the same area as the groundwater contamination with the highest concentrations at or just below the water table.

The Solvent Spill Hydrogeological Investigation and Remedial Action Plan (Ref. 47) recommended two interceptor trenches be installed perpendicular to the groundwater flow. While the interceptor trenches were under construction in April 1987, approximately 200 gallons of contaminated groundwater was released. Immediate action was taken to pump this water to a tanker which was on site for this purpose. Booms and pads were installed in the trench leading from Outfall 003 to prevent the spill from entering Ley Creek (Refs. 47, 68, and 69).

GMC has now removed the tanks and has installed two Interceptor Trenches (SWMU 28) to intercept the contaminated groundwater (Ref. 1).

AOC Number:	B
AOC Name:	Oil Stains Near the Industrial Waste Sump (Photograph 2-3)
Location:	During the VSI, oil staining was observed beneath the opening of a clay pipe which emerges from an enbankment on the north side of the Industrial Waste Sump (SWMU 41).
Description:	Overflow from the Industrial Waste Sump previously discharged to the Lagoon (SWMU 1) (Ref. 80). Facility representatives indicated that this pipe is no longer connected to a waste source. The ditch area underlying the pipe opening is surrounded by a concrete wall approximately four feet high. The ditch is filled with gravel and, according to GMC representatives, is lined with a PVC liner. As of this date, GMC has been unable to explain why the ditch is lined. During the VSI, GMC representatives stated that the oil staining was the result of rainwater splashing around in the pipe opening, washing out waste residues.

AOC Number:	C
AOC Name:	Oil Stains Near the Wet Well (Photograph 3-16)
Location:	During the VSI, oil staining was observed on the south side of the Flotation/Sedimentation Tank (SWMU 49) and the Wet Well (SWMU 50) located at the wastewater treatment plant.
Description:	The oil stain is approximately two feet wide and ten feet long. The oil stain appears to have resulted from leakage in adjacent piping rather than from either the Flotation/Sedimentation Tank or the Wet Well.

V. EXECUTIVE SUMMARY

A RCRA Facility Assessment (RFA) of General Motors Corporation, Fisher Guide Division (GMC Fisher Guide), was conducted to identify Solid Waste Management Units (SWMUs) and other areas of concern (AOCs) located at the site and to assess the potential for release of hazardous constituents to the environment from the identified SWMUs. This RFA consists of a Preliminary Review (PR) of pertinent EPA Region II and New York State Department of Environmental Conservation (NYDEC) files and a Visual Site Inspection (VSI) of the facility. The VSI was conducted on January 18-19, 1989. The RFA was performed in response to the 1984 Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act (RCRA) which gave the EPA the authority to require corrective action at RCRA facilities where releases of hazardous constituents are occurring or have occurred to soils, groundwater, surface water, air, or through the generation of subsurface gas.

The plant was built in 1952 to manufacture steel automobile parts. Plating, buffing, pressing, and dyecasting operations were performed at the facility. In the early 1960s, dyecasting, plating, and some injection molding were performed at the facility. In 1973, all plating operations were discontinued. GMC Fisher Guide now produces plastic automobile body and trim components manufactured by injection molding, painting, and assembly. Injection molding and painting of plastic parts result in the generation of PCB-contaminated hydraulic oils, waste solvents, and PCB-contaminated paint sludge (Ref. 1 and 111).

The facility occupies 84.7 acres of land on the north side of Syracuse, New York (Ref. 1). The area surrounding the facility is industrial. The nearest residential area is located approximately 2,000 feet south of the plant. Ley Creek is located approximately 200 feet north of GMC's property and discharges into Lake Onondaga approximately 3-1/2 miles to the west. Natural surface drainage is to the northeast, towards Ley Creek (Ref. 130). One hundred percent of the facility is located within the 100-year floodplain (Ref. 116).

The facility is underlain by 2 to 10 feet of sand and gravel fill. The fill is underlain by lacustrine deposits and glacial till composed of silts and fine sands with some clay. The glacial till is underlain by shale. The thickness of the unconsolidated deposits is not well defined. One soil boring encountered shale at a depth of 34 feet. The depth to the water table ranges from 2 to 12 feet. Groundwater flow is to the north-northeast, towards Ley Creek.

Releases of hazardous constituents to surface water and groundwater have occurred at the site. The New York State Department of Environmental Conservation (NYDEC) issued a Consent Order to GMC in response to numerous reports of discharge of oil to Ley Creek. As part of the Consent Order, GMC conducted an investigation to locate the source of the oil. As a result of the investigation, GMC discovered that the Underground Oil Reclamation Sumps (SWMU 13) were leaking. The Underground Oil Reclamation Sumps received PCB-contaminated oil from injection molders via the Oil Collection Trenches (SWMU 19). Subsequently, GMC sealed off the sumps and filled them with a cement/sand mixture. PCB-contaminated oil collected by the Oil Collection Trenches are now conveyed directly the Oil Reclamation System located in the Wastewater Treatment Plant via above-ground piping. PCB-contaminated oils remain in the subsurface beneath the Manufacturing Building. The facility has installed two sumps (Oil Reclaim Sumps 518 Molder and 701 Molder, SWMUs 17 and 18) beneath the floor of the Manufacturing Building. One sump was installed in 1985 and the other in 1988 after GMC discovered oily soil beneath the Manufacturing Building floor while sinking piling during remodeling construction activities. Approximately 100 gallons of oil has been pumped from the sump installed in 1985 (SWMU 17). Facility representatives stated that no oil had been removed from the sump recently. No oil has been pumped from the sump installed in 1988 (SWMU 18) (Ref. 1).

GMC discovered leakage of paint thinner solvents from an underground pipeline in early 1985 (Thinner Tanks/Xylene Spill, AOC A) (Ref. 47). The release of paint thinner solvents, consisting primarily of xylene, toluene, and ethyl benzene, most likely occurred over a period of time. GMC conducted an initial investigation to define the extent of contamination in April 1985. The underground pipeline carried paint thinner from three underground tanks containing product paint thinner. On February 18, 1986, a NYDEC Consent Order was issued, instructing GMC to submit water quality monitoring reports from nine monitoring wells in the vicinity of the underground thinner tanks and to continue monitoring for five years after four consecutive quarterly monitoring reports meet NYDEC criteria, as discussed in the Thinner Tank/Xylene Spill description on page IV-77 of this report. The order also instructed GMC to disconnect and cap all underground thinner lines and to initiate a program for identifying the extent of soil contamination caused by the solvent leak (Ref. 75). GMC has now removed the tanks and has installed two Interceptor Trenches (SWMU 28) to intercept the contaminated groundwater (Ref. 1).

Wastes generated at the plant include process wastewater, oily rubbish, polychlorinated biphenyl

(PCB)-contaminated oils, waste hydraulic oils, molder purgings, and waste solvents. SWMUs identified during the RFA include surface impoundments, a hazardous waste drum storage area, wastewater collection sumps, ash management units, oil reclamation system units, groundwater remediation units, wastewater treatment units, a storm sewer, rubbish containers, waste accumulation areas, waste solvent storage tanks, a former landfill, and a former incinerator. Areas of concern include the Thinner Tank/Xylene Spill (AOC A) and two soil stained areas (AOCs B and C). A total of 72 SWMUs and 3 AOCs were identified as a result of the RFA. Tables I-1 and I-2 in Chapter I list all SWMUs and AOCs identified at GMC Fisher Guide. Figures I-1 and I-2 in Chapter I show the locations of all SWMUs and AOCs.

Sampling has been suggested at AOC B, Oil Stains Near the Industrial Waste Sump. During the VSI, extensive oil staining was evident in a ditch located on the north side of the Industrial Waste Sump (SWMU 41). The staining was located beneath the opening of a clay pipe emerging from an embankment. Overflow from the Industrial Waste Sump previously discharged to the Lagoon (SWMU 1). GMC representatives are uncertain if the clay pipe observed during the VSI is the same pipe that previously conveyed wastewater to the Lagoon; however, GMC representatives indicated that this pipe is no longer connected to waste source. During the VSI, GMC representatives stated that the oil staining beneath the pipe opening was the result of rainwater splashing around in the pipe opening, washing out waste residues. The ditch receiving the discharge from the pipe is surrounded by a four-foot high concrete dike and is filled with crushed rock, underlain by a PVC liner. Facility representatives were unable to explain why the ditch is lined. Sampling of the crushed rock is suggested in order to determine if the oily residue contains hazardous constituents. It is further suggested that GMC be required to submit further information regarding the operation of this unit.

Other sampling suggested at the site includes soil sampling at the following units:

- Drum Storage Area No. 2 (SWMU 4),
- Equalization Tank 1 (SWMU 44),
- Filter Press Sump (SWMU 64), and
- Oil Stains Near the Wet Well (AOC C).

A subsurface investigation as part of a RCRA Facility Investigation (RFI) has been suggested to determine the extent of PCB-oil contamination resulting from the leakage from the Underground

Oil Reclamation Sumps (SWMU 13). A subsurface investigation has also been suggested for the Old Storm Sewer System (SWMU 66), to be conducted in conjunction with the RFI suggested for the Underground Oil Reclamation Sumps.

A subsurface investigation has been suggested at the Past Landfill (SWMU 69) to determine if the landfill contains hazardous constituents and if they are being released to the subsurface. Sampling of monitoring wells conducted in 1985 as part of the Thinner Tank/Xylene Spill investigation detected elevated levels of hazardous constituents in the vicinity of the landfill. The landfill may be a source of the contamination.

Integrity testing is suggested at the following SWMUs:

- Powerhouse Wastewater Sump (SWMU 7),
- Oil Collection Trenches (SWMU 19),
- Industrial Waste Treatment Plant Sump (SWMU 22),
- Contaminated Groundwater Tank (SWMU 29),
- Interceptor Sumps (SWMU 30),
- Paint Room Sump (SWMU 31),
- Clarifier (SWMU 32),
- Sludge Sump (SWMU 34),
- Sludge Thickener Tank (SWMU 36),
- Sludge Holding Tank (SWMU 38),
- Holding Tanks (SWMU 40),
- Industrial Waste Sump (SWMU 41),
- Emergency Overflow Sump (SWMU 42),
- Deionized Water Sump (SWMU 43),
- Equalization Tank 1 (SWMU 44),
- Equalization Tank 2 (SWMU 45),
- Batch Tanks No. 1 and No. 2 (SWMU 48),
- Flotation/Sedimentation Tank (SWMU 49),
- Wet Well (SWMU 50),
- Waste Oil Bunkers (SWMU 54),
- Inactive Waste Oil Bunkers (SWMU 55), and
- Emulsifier Bunkers (SWMU 71).

All of the above SWMUs are inground or underground units containing waste materials and it was not possible to assess the integrity of the units during the VSI.

A detailed visual inspection of the following SWMUs is suggested to determine the necessity of more thorough integrity testing:

- Inactive Clarifier (SWMU 33),
- Inactive Sludge Sump (SWMU 35),
- Inactive Sludge Thickener Tank (SWMU 37), and
- Former Cyanide Tank No. 1.

These units have been emptied of waste contents and decontaminated. If a more detailed visual inspection than was possible to conduct during the VSI indicates that past leakage may have occurred, then integrity testing or subsurface sampling is suggested to determine if past release have occurred.

Release pathways are discussed in Chapter VI of this report and a summary of conclusions and suggested further action is included in Chapter VII.

VI. RELEASE PATHWAYS

Soils/Groundwater

There is a high potential for the release of hazardous constituents to the soils and groundwater at the GMC Fisher Guide facility. There are documented reports of PCB-contaminated soils and groundwater beneath the Manufacturing Building resulting from leakage from the Underground Oil Reclamation Sumps (SWMU 13). There are also documented releases of xylene, toluene, and ethyl benzene from the Thinner Tank/Xylene Spill (AOC A). The Old Storm Sewer System (SWMU 66) is in a deteriorated condition and provides a conduit for the movement of contaminated groundwater. Sand and gravel trenches in which the New Storm Sewer System (SWMU 67) is constructed may provide an additional conduit for the movement of contaminated groundwater. Sand and gravel fill material overlying natural soils at the site provide a permeable layer for movement of shallow groundwater.

A Past Landfill (SWMU 69), located in the northwestern corner of the facility property is unlined and has a potential for releasing hazardous constituents to the subsurface and may have contributed to the contamination detected in monitoring wells located downgradient from the landfill. The Lagoon (SWMU 1) is an unlined impoundment and has a high potential for release of hazardous constituents to soils and groundwater. NYDEC closure plans for both Lagoon and the Holding Pond (SWMU 2) are currently undergoing review.

Surface Water

There is a high potential for release of hazardous constituents to Ley Creek. Ley Creek is located approximately 200 feet north of the facility's property. There are documented reports of past unpermitted releases of oil to Ley Creek from GMC's outfalls. GMC determined that the source of the oil was the Underground Oil Reclamation Sumps (SWMU 13). PCB-contaminated oil was discharging from the sumps to the outfalls via the Lagoon (SWMU 1) and the Holding Pond (SWMU 2). There is no potential for ongoing releases from the Underground Oil Reclamation Sumps since they have been closed or from the Lagoon or Holding Pond since they no longer discharge to the outfalls.

There is an ongoing potential for release of hazardous constituents to Ley Creek via groundwater transport through the conduits provided by the Old and New Storm Sewer Systems and the sand and gravel fill material overlying natural soils as discussed in the previous section of this chapter.

There is an ongoing potential for release to Ley Creek through Outfall 003 which receives runoff from newly installed storm pipes installed to collect stormwater from the roof of the Manufacturing Building and Outfall 004 which receives parking lot stormwater runoff. Releases from Outfall 003 are regulated under the current SPDES permit. Outfall 004 is included on GMC's new SPDES permit which is currently under review by NYDEC.

Air

There is low potential for release to air from all SWMUs and AOCs. For those units that are open to the atmosphere, the volatile organic content is low.

Subsurface Gas

There is a high potential for the generation of subsurface gas from volatile organics detected in groundwater monitoring wells. Because the Past Landfill (SWMU 69) is an unlined unit, there is also a high potential for the generation of subsurface gas from the landfill. There is a potential for the generation of subsurface gas from the Lagoon (SWMU 1) because the unit is unlined. This unit will be undergoing closure under a NYDEC closure plan.

VII. SUMMARY OF CONCLUSIONS AND SUGGESTED FURTHER ACTIONS

This section presents the conclusions and the suggested further actions for the SWMUs and AOCs identified during the PR and VSI of GMC Fisher Guide.

For each unit, the potential for release to soils and groundwater, surface water, air, and from the generation of subsurface gas is assessed. A SWMU was assessed as having a potential for release when there was documented contamination, where visual evidence of release was observed during the VSI, or where the design/operation of the unit was determined to allow releases to one or more environmental media. A low potential or no potential for release was assigned in cases where the unit is located inside a building, is in good condition, or has appropriate release controls.

For a number of units, the potential for subsurface release of hazardous constituents is dependent upon the integrity of the particular unit. The integrity of these below-grade units could not be assessed as part of this investigation. Integrity testing has been suggested for these units as a suggested further action.

1. UNIT NAME: Lagoon

CONCLUSIONS:

Soils/Groundwater: There is a high potential for release of hazardous constituents to the subsurface soils and groundwater because the Lagoon is unlined. Wells located downgradient from the Lagoon have detected elevated levels of organics and metals; however, the origin of constituents detected in the wells is uncertain.

Surface Water: There is a high potential for release of hazardous constituents to Ley Creek, located approximately 700 feet downgradient from the Lagoon. Up until December 1986, the Lagoon discharged to Ley Creek via Outfall 002 and 003. There are documented reports of unpermitted releases of organics and oil to Outfall 002. There are also numerous documented reports of oil discharged to Ley Creek.

Air: There was a high potential for release of hazardous constituents from the Lagoon during its active operating period since the Lagoon contained volatile organics. Currently, there is low potential for release of volatile constituents to the atmosphere because this unit has been inactive for two years.

Subsurface Gas: There is high potential for the generation of subsurface gas because the Lagoon is unlined.

SUGGESTED FURTHER ACTION: No further action is suggested except continued compliance under the NYDEC closure regulations. Any past or ongoing releases from this unit to soils, groundwater, and surface water will be addressed as part of the NYDEC closure plan.

2. UNIT NAME: Holding Pond

CONCLUSIONS:

Soils/Groundwater: There is low potential for release of hazardous constituents to the subsurface soils and groundwater as long as the integrity of the synthetic containment liner remains intact. Wells located downgradient from the Lagoon have detected elevated levels of hazardous constituents; however, the origin of constituents detected in the wells are uncertain.

Surface Water: There is a high potential for release of hazardous constituents to Ley Creek, located approximately 600 feet downgradient from the Lagoon. Up until December 1986, the Holding Pond discharged to Ley Creek via Outfall 001 and 003. There are documented reports of unpermitted releases of organics and oil to Outfall 001. There are also numerous documented reports of oil discharged to Ley Creek.

Air: There was a high potential for release of hazardous constituents from the Holding Pond during its active operating period since the Holding Pond contained volatile organics. Currently, there is low potential for release of volatile constituents to the atmosphere because this unit has been inactive for two years.

Subsurface Gas: There is low potential for generation of subsurface gas because this pond is lined with a synthetic liner.

SUGGESTED FURTHER ACTION: No further action is suggested except continued compliance under the NYDEC closure regulations. Any past or ongoing releases from this unit to soils, groundwater, and surface water will be addressed as part of the NYDEC closure plan.

3. UNIT NAME: Drums Storage Area No. 1

CONCLUSIONS:

Soils/Groundwater: There is a high potential for release of hazardous constituents to underlying soils and groundwater. During the VSI, the asphalt pad underlying the drum storage area was observed to be in poor condition. Staining was observed on adjacent soils and on some of the wood pallets holding drums.

Surface Water: There is low potential for release of hazardous constituents to surface water because the nearest surface water body is Ley Creek, located approximately 1800 feet downgradient from the unit.

Air: There is low potential for release of volatile constituents to the air because the drums are covered.

Subsurface Gas: There is low potential for the generation of subsurface gas because this is an above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested because this is a RCRA unit being closed under an approved RCRA closure plan. The facility plans to conduct soil sampling as part of closure.

4. UNIT NAME: Drum Storage Area No. 2

CONCLUSIONS:

Soils/Groundwater: The past potential for release of hazardous constituents to soils and groundwater is unknown because this unit has not operated since 1981 and the integrity of the concrete containment pad during the active life of the unit is unknown.

There is no ongoing potential for release to soils and groundwater because drums are no longer stored at this location.

Surface Water: The past potential for release of hazardous constituents to surface water is low because the nearest surface water body is Ley Creek, located approximately 1800 feet downgradient from the unit.

Currently, there is no potential for release of hazardous constituents to surface water because waste is no longer stored at this location.

Air: There was a low potential for release of volatile constituents to air because the drums were covered.

Currently, there is no potential for release of volatile hazardous constituents to air because drums are no longer stored at this location.

Subsurface Gas: There was no past potential for the generation of subsurface gas because this was an above-ground unit.

SUGGESTED FURTHER ACTION: Soil sampling is suggested to determine whether hazardous constituents have been released to the subsurface.

5.	UNIT NAME:	Hazardous Waste Accumulation Area
	CONCLUSIONS:	Soils/Groundwater: There is low potential for release of hazardous constituents to soils and groundwater because this is an above-ground indoor unit underlain by a concrete floor. Surface Water: There is low potential for release of hazardous constituents to surface water because this is an indoor unit. Air: There is low potential for release of hazardous constituents to air because this is an indoor unit. Subsurface Gas: There is no potential for the generation of subsurface gas because this is an indoor, above-ground unit.
	SUGGESTED FURTHER ACTION:	No further action is suggested at this time.

6. UNIT NAME: Kolene Unit

CONCLUSIONS:

Soils/Groundwater: There was low past potential for release of hazardous constituents to soils and groundwater because this was an indoor, above-ground unit.

There is no ongoing potential for release of hazardous constituents to soils and groundwater because the unit has been removed.

Surface Water: There was low past potential for release of hazardous constituents to surface water because this was an indoor unit.

There is no ongoing potential for release of hazardous constituents to surface water because the unit has been removed.

Air: This unit was vented to the atmosphere. Air releases were permitted under a NYDEC air permit.

There is no ongoing potential for release of hazardous constituents to air because the unit has been removed.

Subsurface Gas: There was no past potential for generation of subsurface gas because this was an above-ground unit.

There is no ongoing potential for generation of subsurface gas because the unit has been removed.

CONCLUSIONS: No further action is suggested at this time.

7. UNIT NAME: Powerhouse Wastewater Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete sump. The integrity of the sump could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the sump is located within a concrete block building.

Air: The potential for release to the atmosphere is low because the sump is located within a concrete block building.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete sump. The integrity of the sump could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the concrete is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

8. UNIT NAME: Ash Silo

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is low because this a fully enclosed, above-ground unit.

Surface Water: The potential for release to surface water is low because this is a fully enclosed unit, located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the Ash Baghouse (SWMU 10) is used to remove dust particles from air vented to the atmosphere.

Subsurface Gas: There is no potential for the generation of subsurface gas because this is an above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

8. UNIT NAME: Ash Scrubber

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because this is an enclosed, above-ground unit.

Surface Water: There is low potential for release to surface water because this is a fully enclosed unit, located approximately 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because this unit is fully enclosed.

Subsurface Gas: There is no potential for the generation of subsurface gas because this is an above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

10. UNIT NAME: Ash Baghouse

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because this is an enclosed, above-ground unit.

Surface Water: There is low potential for release to surface water because this is a fully enclosed unit, located approximately 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because this unit is fully enclosed.

Subsurface Gas: There is no potential for the generation of subsurface gas because this is an above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

11. UNIT NAME: Ash Pits

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the pits are enclosed and located indoors.

Surface Water: There is low potential for release to surface water because the pits are enclosed and located indoors.

Air: There is low potential for release to air because the pits are enclosed and located indoors.

Subsurface Gas: There is no potential for generation of subsurface gas because the pits are above-ground units and located indoors.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

12. UNIT NAME: Coal Elevator Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because this is an indoor unit, located approximately 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to the atmosphere because this is an indoor unit.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

13. UNIT NAME: Underground Oil Reclamation Sumps

CONCLUSIONS:

Soils/Groundwater: There is a high potential for release to soils and groundwater. GMC determined during an investigation to locate the source of oil discharged to the Lagoon (SWMU 1) and the Holding Pond (SWMU 2), and subsequently to Ley Creek, that 65 to 70 percent of the Underground Oil Reclamation Sumps were leaking.

Surface Water: There was a high past potential for release to surface water from the sumps via the Lagoon and the Holding Pond because GMC determined that the sumps were the source of oil being discharged to the impoundments.

There is no ongoing potential for release to surface water because the sumps have been closed.

Air: The past potential for release to air was low because the sumps were underground units.

There is no ongoing potential for release to air because the sumps have been closed.

Subsurface Gas: There was a high past potential for the generation of subsurface gas because the sumps were determined to be leaking.

SUGGESTED FURTHER ACTION: A subsurface investigation as part of a RCRA facility investigation (RFI) is suggested to determine the extent of contamination.

14. UNIT NAME: Underground Oil Storage Tanks

CONCLUSIONS:

Soils/Groundwater: The past potential for release to soils and groundwater was low as long as the tanks were of good integrity. GMC determined during an investigation to locate the source of oil discharge to the Lagoon (SWMU 1) and the Holding Pond (SWMU 2) that the tanks were not leaking.

Surface Water: The past potential for release to surface water was low since GMC determined that the tanks were not leaking.

There is no ongoing potential for release to surface water because the tanks have been closed.

Air: The past potential for release to air was low because the tanks were underground units.

There is no ongoing potential for release to air because the tanks have been closed.

Subsurface Gas: The past potential for generation of subsurface gas was low since GMC determined that the tanks were not leaking.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

15. UNIT NAME: Portable Pumping Units

CONCLUSIONS:

Soils/Groundwater: There is no potential for release to soils and groundwater because the units are above ground and are located indoors.

Surface Water: There is no potential for release to surface water because the units are located indoors.

Air: There is low potential for release to air because the units are located indoors and are fully self-contained.

Subsurface Gas: There is no potential for generation of subsurface gas because the units are above-ground and located indoors.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

16. UNIT NAME: Dirty Oil Transfer Station

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because this is an indoor unit underlain by a concrete floor.

Surface Water: There is low potential for release to surface water because this is an indoor unit.

Air: There is low potential for release to air because this is an indoor unit.

Subsurface Gas: There is no potential for the generation of subsurface gas because this is an above-ground, indoor unit.

SUGGESTED FURTHER ACTION: It is suggested that GMC be instructed to clean up spillage on the floor underlying this unit and to install adequate collection pans to contain spillage.

17. UNIT NAME: Oil Reclaim Sump 518 Molder

CONCLUSIONS:

Soils/Groundwater: There is high potential for release to soils and groundwater because the sump is unlined. This unit was installed to provide a pooling area for the removal of contaminated oil discovered beneath the floor of the Manufacturing Building.

Surface Water: There is low potential for release to surface water because this unit is located approximately 1400 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because the sumps are below ground and indoors.

Subsurface Gas: There is high potential for the generation of subsurface gas because the sump is unlined and inground.

SUGGESTED FURTHER ACTION: A subsurface investigation as part of the RFI suggested for the Underground Oil Reclamation Sumps (SWMU 13) is suggested.

18. UNIT NAME: Oil Reclaim Sump 701 Molder

CONCLUSIONS:

Soils/Groundwater: There is high potential for release to soils and groundwater because the sump is unlined. This unit was installed to provide a pooling area for the removal of contaminated oil discovered beneath the floor of the Manufacturing Building.

Surface Water: There is low potential for release to surface water because this unit is located approximately 1400 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because the sumps are below ground and indoors.

Subsurface Gas: There is high potential for the generation of subsurface gas because the sump is unlined and inground.

SUGGESTED FURTHER ACTION: A subsurface investigation as part of the RFI suggested for the Underground Oil Reclamation Sumps (SWMU 13) is suggested.

19. UNIT NAME: Oil Collection Trenches

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete of the trenches. The integrity of the concrete could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the trenches are indoors and located approximately 1400 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the trenches are located indoors.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete of the trenches. The integrity of the concrete could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the trenches is suggested. If the integrity is found to be impaired, patch the trenches or replace with oil collection pans. Incorporate soil sampling with the RFI suggested for the Underground Oil Reclamation Sumps (SWMU 13).

20. UNIT NAME: Oil Collection Pans

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the pans are indoor, above-ground units.

Surface Water: There is low potential for release to surface water because the pans are indoor units.

Air: There is low potential for release to air because the pans are indoor units.

Subsurface Gas: There is no potential for the generation of subsurface gas because the pans are indoor, above-ground units.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

21. UNIT NAME: Dirty Oil Tanks

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the tank is located within a concrete containment tank, are fully enclosed, and in good condition.

Surface Water: There is low potential for release to surface water because the tank is located within a concrete containment tank, approximately 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because the tanks are not open to the atmosphere.

Subsurface Gas: There is no potential for the generation of subsurface gas because the tanks are located within a concrete containment tank.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

22. UNIT NAME: Industrial Waste Treatment Plant (IWTP) Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete of the sump. The integrity of the concrete could not be inspected during the VSI.

Surface Water: The potential for release to surface is low because the sump is located 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the sump is located indoors.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete of the sump. The integrity of the concrete could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the concrete is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

23. UNIT NAME: Primary Dirty Oil Filter

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the filter is located indoors on a concrete floor.

Surface Water: There is low potential for release to surface water because the filter is located indoors.

Air: There is low potential for release to air because the filter is located indoors and is not open to the atmosphere.

Subsurface Gas: There is no potential for the generation of subsurface gas because the filter is an indoor, above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

24. UNIT NAME: Vacuum Distillation Units

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the units are located indoors on a concrete floor.

Surface Water: There is low potential for release to surface water because the units are located indoors.

Air: There is low potential for release to air because the units are located indoors and are not open to the atmosphere.

Subsurface Gas: There is no potential for the generation of subsurface gas because the units are indoor, above-ground units.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

25. UNIT NAME: Secondary Dirty Oil Filter

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the filter is located indoors on a concrete floor.

Surface Water: There is low potential for release to surface water because the filter is located indoors.

Air: There is low potential for release to air because the filter is located indoors and is not open to the atmosphere.

Subsurface Gas: There is no potential for the generation of subsurface gas because the filter is an indoor, above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

26. UNIT NAME: Dirty Oil Holding Tanks

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the tanks are located indoors on a concrete floor.

Surface Water: There is low potential for release to surface water because the tanks are located indoors.

Air: There is low potential for release to air because the tanks are located indoors and are not open to the atmosphere.

Subsurface Gas: There is no potential for the generation of subsurface gas because the tanks are indoor, above-ground units.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

27. UNIT NAME: Kidney Filters

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the filters are located indoors on a concrete floor.

Surface Water: There is low potential for release to surface water because the filters are located indoors.

Air: There is low potential for release to air because the filters are located indoors and are not open to the atmosphere.

Subsurface Gas: There is no potential for the generation of subsurface gas because the filters are indoor, above-ground units.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

28. UNIT NAME: Interceptor Trenches

CONCLUSIONS:

Soils/Groundwater: There is a high potential for release to soils and groundwater because the trenches are unlined; however, the trenches serve to collect groundwater contaminated by the Thinner Tanks/Xylene Spill (AOC A).

Surface Water: The potential for release to surface water is low because the trenches are located approximately 1300 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the trenches are underground

Subsurface Gas: The potential for the generation of subsurface gas is high because the trenches are unlined.

SUGGESTED FURTHER ACTION: No further action is suggested expect for continued monitoring under the NYDEC Consent Order.

29. UNIT NAME: Contaminated Groundwater Tank

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the tank is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the concentration of volatile organic constituents is low.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tank is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

30. UNIT NAME: Interceptor Sumps

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete sumps. The integrity could not be inspected during the VSI.

Surface Water: There is low potential for release to surface water because the sumps are concrete lined and are located approximately 1000 to 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because the sumps are enclosed.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete sumps. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the sumps is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

31. UNIT NAME: Paint Room Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete sump. The integrity of the concrete could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the sump is located indoors.

Air: The potential for release to air is low because the sump is located indoors and is covered with a metal plate.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the sump is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

32. UNIT NAME: Clarifier

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the clarifier is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the volatile organic content of the wastewater is low.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tank is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

33. UNIT NAME: Inactive Clarifier

CONCLUSIONS:

Soils/Groundwater: The past potential for release to soils and groundwater is dependent on the integrity of the concrete. No cracking or corrosion of the concrete was evident during the VSI.

Surface Water: The past potential for release to surface water was low because the clarifier is located approximately 2000 feet from the nearest downgradient surface water body.

Currently, there is no potential for release to surface water because the unit contains no waste.

Air: The past potential for release to air was low because the volatile organic content of the wastewater was low.

Currently, there is no potential for release to air because the unit contains no waste and has been decontaminated.

Subsurface Gas: The past potential for generation of subsurface gas is dependent on the integrity of the concrete. No cracking or corrosion of the concrete was evident during the VSI.

SUGGESTED FURTHER ACTION: A detailed visual inspection of the concrete is suggested to determine whether integrity tests or subsurface sampling should be conducted.

34. UNIT NAME: Sludge Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater through the sump walls is dependent on the integrity of the concrete. The integrity of the concrete could not be inspected during the VSI. There is a high potential for release to soils and groundwater from spillage. During the VSI, soil staining was evident on the soils adjacent to the sump.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the sump is suggested. Soil sampling is suggested to determine if hazardous constituents have been released to the subsurface through impaired integrity or spillage.

35. UNIT NAME: Inactive Sludge Sump

CONCLUSIONS:

Soils/Groundwater: The past potential for release to soils and groundwater is dependent on the integrity of the concrete. No cracking or corrosion of the concrete was evident during the VSI.

Surface Water: The past potential for release to surface water was low because the sump is located approximately 2000 feet from the nearest downgradient surface water body.

Currently, there is no potential for release to surface water because the unit contains no waste.

Air: The past potential for release to air was low because the volatile organic content of the wastewater was low.

Currently, there is no potential for release to air because the unit contains no waste and has been decontaminated.

Subsurface Gas: The past potential for generation of subsurface gas is dependent on the integrity of the concrete. No cracking or corrosion of the concrete was evident during the VSI.

SUGGESTED FURTHER ACTION: A detailed visual inspection of the concrete is suggested to determine whether integrity tests or subsurface sampling should be conducted.

36. UNIT NAME: Sludge Thickener Tank

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tank is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

37. UNIT NAME: Inactive Sludge Thickener Tank

CONCLUSIONS:

Soils/Groundwater: The past potential for release to soils and groundwater is dependent on the integrity of the concrete. No cracking or corrosion of the concrete was evident during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Currently, there is no potential for release to surface water because the tank contains no waste.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Currently, there is no potential for release to air because the tank contains no waste.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. No cracking or corrosion of the concrete was evident during the VSI.

SUGGESTED FURTHER ACTION: A detailed visual inspection of the concrete is suggested to determine whether integrity tests or subsurface sampling should be conducted.

38. UNIT NAME: Sludge Holding Tank

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tank is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

39. UNIT NAME: Filter Press

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because this unit is an above-ground unit located inside a shed and underlain by a concrete pad which is diked on three sides. The remaining side slopes towards the Filter Press Sump (SWMU 64).

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the waste is low and the unit is located inside a shed.

Subsurface Gas: There is no potential for the generation of subsurface gas because this is an above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

40. UNIT NAME: Holding Tanks

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the tanks are located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tanks is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

41. UNIT NAME: Industrial Waste Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The past potential for release to surface water was high via the Lagoon (SWMU 1) and Outfall 001 because this sump previously discharged to the Lagoon.

There is low ongoing potential for release to surface water because this sump no longer discharges to the Lagoon. The sump is located approximately 1000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the unit is located inside a concrete building.

Subsurface Gas: The potential for generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the sump is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

42. UNIT NAME: Emergency Overflow Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete sump. The integrity could not be inspected during the VSI.

of the concrete

Surface Water: The potential for release to surface water is low because the unit is located indoors approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the sump is located indoors.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the sump is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

43. UNIT NAME: Deionized Water Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located indoors approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the sump is located indoors.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the sump is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

44. UNIT NAME: Equalization Tank 1

CONCLUSIONS:

Soils/Groundwater: The potential for release through the concrete walls of the tank to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI. There is a high potential for release to soils from the Brill rope oil skimmer. During the VSI, oil staining was observed on the eastern side of the tank, apparently the result of drippage from the skimmer.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION:

Soil sampling in the area of oil staining is suggested to determine if hazardous constituents have been released to the subsurface.

Integrity testing of the tank is suggested. If the integrity is found to be impaired, further soil sampling is suggested to determine if hazardous constituents have been released to soils and groundwater.

45, 46

UNIT NAME: Equalization Tanks 2 and 3

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. Deterioration of the fiberglass lining on the inside walls of both tanks was evident. The Equalization Tank 2 walls showed evidence of corrosion.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete.

SUGGESTED FURTHER ACTION:

Integrity testing of the tanks is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

47. UNIT NAME: Coalescing Plate Separators

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the Batch Tanks (SWMU 48) and the Flotation/Sedimentation Tank (SWMU 49) would act as secondary containment in the event of a leak.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because the separators fully self-contained steel tanks.

Subsurface Gas: There is no potential for the generation of subsurface gas because the separators are above-ground units.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

48

UNIT NAME: Batch Tanks No. 1 and No. 2

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the tanks are located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tanks is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

49. UNIT NAME: Flotation/Sedimentation Tank

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tank is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

50. UNIT NAME: Wet Well

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the unit is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

51. UNIT NAME: Carbon Filtration Units

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is low because the units are located indoors on a concrete floor and surrounded by a concrete curb.

Surface Water: There is low potential for release to surface water because the units are located indoors.

Air: There is low potential for release to air because the tanks are self-contained and located indoors.

Subsurface Gas: There is no potential for the generation of subsurface gas because the units are above ground.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

52. UNIT NAME: 2,000-Gallon Waste Oil Tank

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because the tank is an indoor, above-ground unit.

Surface Water: There is low potential for release to surface water because the tank is an indoor unit.

Air: There is low potential for release to air because the tank is self-contained and located indoors.

Subsurface Gas: There is no potential for the generation of subsurface gas because the tank is an above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

53. UNIT NAME: 3,000-Gallon Waste Oil Tank

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is low because the tank is elevated within a concrete containment tank, is fully enclosed, and in good condition.

Surface Water: The potential for release to surface water is low because the unit has secondary containment and is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the tank is enclosed.

Subsurface Gas: There is no potential for the generation of subsurface gas because the tank is elevated within secondary containment.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

54. UNIT NAME: Waste Oil Bunkers (2)

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the tanks and the secondary containment. Neither the tanks or the walls of the secondary containment are visible and, therefore, could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because the tanks are completely enclosed.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the tanks and of the secondary containment. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tanks is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

55. UNIT NAME: Inactive Waste Oil Bunkers (4)

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the tanks and of the secondary containment. Neither the tanks or the walls of the secondary containment are visible and, therefore, could not be inspected during the VSI.

Surface Water: The past potential for release to surface water was low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

There is no ongoing potential for release to surface water because the tanks have been closed.

Air: The past potential for release to air was low because the tanks were fully enclosed.

There is ongoing potential for release to air because the tank has been closed.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the tanks and of the secondary containment. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tanks is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

56. UNIT NAME: Former Cyanide Tank No. 1

CONCLUSIONS:

Soils/Groundwater: The past potential for release to soils and groundwater is dependent on the integrity of the concrete tank. The integrity could not be inspected during the VSI.

There is low ongoing potential for release to soils and groundwater because the tank was emptied of wastes and decontaminated and now serves as secondary containment for other solid waste management units and a clean oil tank.

Surface Water: The past and ongoing potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The past potential for release to air was low because the organic content of the wastewater was low.

There is no ongoing potential for release to air because the tank has been closed.

Subsurface Gas: The past potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

There is low ongoing potential for generation of subsurface gas because the tank was emptied of wastes and decontaminated and now serves as secondary containment for other solid waste management units and a clean oil tank.

SUGGESTED FURTHER ACTION: A detailed visual inspection of the concrete is suggested to determine whether integrity tests or subsurface sampling should be conducted.

57, 58, and 59	UNIT NAME:	Former Sludge Holding Tanks, Vacuum Filters, and Sludge Conveyor
	CONCLUSIONS:	Soils/Groundwater: There was low past potential for release to soils and groundwater because the units were above ground and located indoors. There is no ongoing potential for release to soils and groundwater because the units have been removed. Surface Water: The past potential for release to surface water is low because the units were located indoors, approximately 2000 feet from the nearest downgradient surface water body. There is no ongoing potential for release to surface water because the units have been removed. Air: There was low past potential for release to air because the units were located indoors. There is no ongoing potential for release to air because the units have been removed. Subsurface Gas: There was no past potential for the generation of subsurface gas because the units were indoors and above ground. There is no ongoing potential for the generation of subsurface gas because the units have been removed.
	SUGGESTED FURTHER ACTION:	No further action is suggested at this time.

60. UNIT NAME: Corrugated Plate Interceptor Unit

CONCLUSIONS:

Soils/Groundwater: There was low past potential for release to soils and groundwater because this unit was located indoors.

There is no ongoing potential for release to soils and groundwater because the unit has been removed.

Surface Water: There was low past potential for release to surface water because the unit was located indoors, approximately 2000 feet from the nearest downgradient surface water body.

There is no ongoing potential for release to surface water because the unit has been removed.

Air: There was low past potential for release to air because the unit was located indoors.

There is no ongoing potential for release to air because the unit has been removed.

Subsurface Gas: There was no past potential for the generation of subsurface gas because this was an above-ground, indoor unit.

There is no ongoing potential for the generation of subsurface gas because the unit has been removed.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

61. UNIT NAME: SO_2 Scrubbers

CONCLUSIONS:

Soils/Groundwater: There was low past potential for release to soils and groundwater because the scrubbers were enclosed metal tanks located above ground.

There is no ongoing potential for release to soils and groundwater because the scrubbers have been removed.

Surface Water: There was low past potential for release to surface water because the scrubbers were enclosed tanks and located approximately 2000 feet from the nearest downgradient surface water body.

There is no ongoing potential for release to surface water because the scrubbers have been removed.

Air: There was low past potential for release to air because the scrubbers were enclosed tanks.

There is no ongoing potential for release to air because the scrubbers have been removed.

Subsurface Gas: There was no past potential for the generation of subsurface gas because the scrubbers were above-ground units.

There is no ongoing potential for generation of subsurface gas because the scrubbers have been removed.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

62. UNIT NAME: Alkali Tanks No. 1 and No. 2

CONCLUSIONS:

Soils/Groundwater: The past potential for release to soils and groundwater is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

The ongoing potential for release to soils and groundwater is dependent on the integrity of the Alkali Tanks and of the Waste Oil Bunkers (SWMU 54) and the Emulsifier Bunkers (SWMU 72) for which the Alkali Tanks No. 1 and No. 2 serve as secondary containment. The sides and bottoms of the Bunkers or the Alkali Tanks are not within view and, therefore, could not be inspected during the VSI.

Surface Water: The past and ongoing potential for release to surface water was and is low because the tanks are located approximately 2000 feet from the nearest downgradient surface water body.

Air: The past potential for release to air was low because the volatile organic content of the wastewater was low.

There is no ongoing potential for release to air since the Alkali Tanks wastes were removed and the tanks now serve as secondary containment for the Bunkers.

Subsurface Gas: The past potential for the generation of subsurface gas is dependent on the integrity of the concrete. The ongoing potential for the generation of subsurface gas is dependent on the integrity of the Alkali Tanks and the Bunkers. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the Bunkers as discussed in the suggested further action for the Waste Oil Bunkers (SWMU 54) and the Emulsifier Bunkers (SWMU 72) is suggested.

63. UNIT NAME: Sludge Dumpster

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater because of the nature of the waste and because the dumpster is located on a concrete pad.

Surface Water: The potential for release to surface water is low because the dumpster is located approximately 2000 feet from the nearest downgradient surface water body.

Air: There is no potential for release to air because the waste contains no volatile hazardous constituents and the dumpster is kept covered.

Subsurface Gas: There is no potential for the generation of subsurface gas because this is an above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

64. UNIT NAME: Filter Press Sump

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater through the concrete sump is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI. There is a high potential for release to soils and groundwater through spillage. During the VSI, spillage on unprotected soils located adjacent to the sump was evident.

Surface Water: There is low potential for release to surface water because the sump is located approximately 2000 feet from the nearest downgradient surface water body.

Air: The potential for release to air is low because the organic content of the wastewater is low.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the concrete. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Soil sampling of stained soils around the sump is suggested to determine if hazardous constituents have been released to the soil. Periodic integrity testing of the sump is suggested.

65. UNIT NAME: Hoffman Filter Unit

CONCLUSIONS:

Soils/Groundwater: There was low past potential for release to soils and groundwater because this was an indoor unit.

There is no ongoing potential for release to soils and groundwater because the unit has been taken out of service.

Surface Water: There was low past potential for release to surface water because this was an indoor unit.

There is no ongoing potential for release to surface water because the unit has been taken out of service.

Air: There was low past potential for release to air because this was an indoor unit.

There is no ongoing potential for release to air because the unit has been taken out of service.

Subsurface Gas: There was no past potential for the generation of subsurface gas because this was an above-ground unit.

There is no ongoing potential for the generation of subsurface gas because the unit has been taken out of service.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

66. UNIT NAME: Old Storm Sewer System

CONCLUSIONS:

Soils/Groundwater: There is a high potential for release to soils and groundwater because the sewer lines are suspected to be deteriorated and GMC believes that leakage of PCB-contaminated oil has entered into the deteriorated sewer lines.

Surface Water: There was a high past potential for release to surface water via the Lagoon (SWMU 1) and the Holding Pond (SWMU 2) since the sewer lines previously discharged to Outfall 001 located at the Holding Pond.

There continues to be a potential for release to Ley Creek via groundwater transport.

Air: There is low potential for release to air because the sewer lines are underground.

Subsurface Gas: There is a high potential for the generation of subsurface gas because the sewer lines are suspected to be deteriorated.

SUGGESTED FURTHER ACTION: A subsurface investigation as part of the RFI suggested for the Underground Oil Reclamation Sumps (SWMU 13) is suggested.

67. UNIT NAME: New Storm Sewer System

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater from the above-ground portion of the New Storm Sewer System. The potential for release to soils and groundwater from the underground portion of the New Storm Sewer System is dependent on the integrity of the piping. The integrity could not be inspected during the VSI, but the piping was installed recently (1985).

Surface Water: Discharge to surface water is regulated under a SPDES permit.

Air: There is low potential for release to air because the sewer is completely enclosed.

Subsurface Gas: There is no potential for the generation of subsurface gas from the above-ground portion of the New Storm Sewer System. The potential for the generation of subsurface gas from the underground portion of the New Storm Sewer System is low due to the nature of the wastes managed.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

68.	UNIT NAME:	Oil Contaminated Rubbish Containers
	CONCLUSIONS:	Soils/Groundwater: There is low potential for release to soils and groundwater since the containers are located indoors on a concrete floor. Surface Water: There is low potential for release to surface water because this is an indoor unit. Air: There is low potential for release to air since this is an indoor unit. Subsurface Gas: There is no potential for the generation of subsurface gas because this is an indoor, above-ground unit.
	SUGGESTED FURTHER ACTION:	No further action is suggested at this time.

69. UNIT NAME: Past Landfill

CONCLUSIONS:

Soils/Groundwater: There is a high potential of release to soils and groundwater because the landfill is unlined. Sampling of downgradient monitoring wells conducted in 1985 detected elevated levels of hazardous constituents.

Surface Water: There is a high potential for release to Ley Creek via groundwater transport. Ley Creek is located approximately 200 feet downgradient from the landfill.

Air: There is low potential for release to air because the landfilled waste is covered with six to eight feet of clay.

Subsurface Gas: There is a high potential for the generation of subsurface gas because the landfill is unlined and may contain volatile organics.

SUGGESTED FURTHER ACTION: A subsurface investigation as part of a RFI is suggested in order to determine if the landfill as released hazardous constituents to the groundwater. If hazardous constituents are detected, appropriate remedial action should be taken.

70. UNIT NAME: Flammable Storage Room Waste Accumulation Area

CONCLUSIONS:

Soils/Groundwater: There is low potential for release to soils and groundwater since this unit is located indoors on a concrete floor.

Surface Water: There is low potential for release to surface water because this is an indoor unit.

Air: There is low potential for release to air since this is an indoor unit and the drums are covered.

Subsurface Gas: There is no potential for the generation of subsurface gas because this is an indoor, above-ground unit.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

71. UNIT NAME: Emulsifier Bunkers (2)

CONCLUSIONS:

Soils/Groundwater: The potential for release to soils and groundwater is dependent on the integrity of the tanks and of the secondary containment. Neither the tanks or the walls of the secondary containment are visible and, therefore, could not be inspected during the VSI.

Surface Water: The potential for release to surface water is low because the unit is located approximately 2000 feet from the nearest downgradient surface water body.

Air: There is low potential for release to air because the tanks are completely enclosed.

Subsurface Gas: The potential for the generation of subsurface gas is dependent on the integrity of the tanks and of the secondary containment. The integrity could not be inspected during the VSI.

SUGGESTED FURTHER ACTION: Integrity testing of the tanks is suggested. If the integrity is found to be impaired, soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.

72. UNIT NAME: Incinerator

CONCLUSIONS:

Soils/Groundwater: The past potential for release to soils and groundwater is unknown because information regarding the design of the unit is not available.

There is no ongoing potential for release to soils and groundwater because the unit has been removed.

Surface Water: The past potential for release to surface water was low because the unit was located approximately 2000 feet from the nearest downgradient surface body.

There is no ongoing potential for release to surface water because the unit has been removed.

Air: There was a high past potential for release to air. No information is available regarding regulation of emissions from this unit.

There is no ongoing potential for release to air because the unit has been removed.

Subsurface Gas: There was no past potential for the generation of subsurface gas because this was an above-ground unit.

There is no ongoing potential for the generation of subsurface gas because the unit has been removed.

SUGGESTED FURTHER ACTION: No further action is suggested at this time.

A. UNIT NAME: Thinner Tank/Xylene Spill

SUGGESTED FURTHER ACTION: No further action is suggested at this time except continued monitoring as required by the February 18, 1986, NYDEC Consent Order.

B. UNIT NAME: Oil Stains Near the Industrial Waste Sump

SUGGESTED FURTHER ACTION: Sampling of the oil-stained crushed rock is suggested to determine if the oily residue contains hazardous constituents. It is further suggested that GMC be required to submit further information regarding the operation of this unit.

C. UNIT NAME: Oil Stains Near the Wet Well

SUGGESTED FURTHER ACTION: Soil sampling is suggested to determine if hazardous constituents have been released to the subsurface.